

Devick, Dale A.
Page 1 of 3

TEP Powerline Proposal

From: Daledgy@aol.com [SMTP:Daledgy@aol.com]
To: Pell, Jerry
Cc:

Subject: TEP Powerline Proposal
Sent: 10/13/2003 9:37 AM
Importance: Normal
Dr Jerry Pell,

Jerry, it has been some 2 years since Rich Bohman & I had the privilege of driving you around the Tubac area and having lunch with you at the Tubac Country Club. As I recall, you had a new camera and, as a fellow photography enthusiast, I have often wondered how your photos came out and are you still enjoying your hobby?

As you are well aware, we continue to struggle with the Tucson Electric Proposal, (Proposals) to build a 345 KV 1,000 MW power line down to the Mexican border, and on into Mexico, using the ruse and under the guise that Nogales needs an additional and alternate power source.

1 Considering that the Nogales area presently has adequate power through the present upgraded TEP 115 KV line, and that there is backup local generation capacity in place to pick up the load or augment the present power line capacity, it becomes obvious that the 1,000 Meg Watt 345 KV proposed line is simply a ploy by TEP to make a case for building the hugely over capacity powerline under the guise of supplying the Nogales area a backup source for its 50 to 60 MW needs. Further, there is no market in Mexico for the power TEP
2 proposes to sell to Mexico. The Mexican Constitution forbids importation of electricity. President Fox tried and failed to get support for a constitutional amendment that would allow

Comment No. 1

The ACC is vested with the state's authority to decide how it believes energy should be furnished within Arizona's borders (for example, the need for and effectiveness of transmission lines within its borders). Refer to ACC, Comment 1, and to the revised text in Section 1.1.2, The Origin of TEP's Proposal: TEP's Business Plan and the Proceedings of the Arizona Corporation Committee, that provides explanation of the jurisdictions and authorities of the state and Federal agencies, and their relationship to this NEPA analysis.

As explained in section 2.1.5, improvements to the local distribution system (formerly Citizens) do not eliminate the need for the proposed second transmission line.

Comment No. 2

If TEP's proposed project is approved by each of the Federal agencies, then there would still be a variety of events that could preclude TEP from implementing this project, such as the possibility of failure by TEP to secure a power sales contract with CFE. Issuance of a Presidential Permit by DOE would only indicate that DOE has no objection to the project, but would not mandate that the project be built

Section 1.5, TEP's Proposed Project Capacity and Usage, explains the connection between TEP's proposed project and Mexico's electric grid. Also, the passage of NAFTA established the benefits of strengthening and enhancing the electricity trade with Canada and Mexico.

Devick, Dale A.
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cont. importation of electricity. Even if it were legal to export electricity to Mexico, the TEP proposal has no provision to connect to the Mexican standards and proposes to impose US standards on a good portion of Northern Mexico and make it part of the US Grid. After the recent collapse of the Northeastern and Canadian grid, it seems obvious that expanding the grid into Mexico would only increase the chance of a failure and bringing down the whole Western Grid. We must keep in mind that in many ways, Mexico is still a Third World Country with many problems and a general lack of adequate regulation and standards of and for utilities.
- 3
- 4 All that is required to satisfy the Arizona Corporation Commission mandate would be a simple 115 KV line paralleling the present 115 KV line, or even better, a locale generating facility in the immediate Nogales area, which would have the advantage of shorter lines and less line loss as well as isolating Nogales from some future TEP power outage.
- 5 TEP does not have the generating capacity to meet it's present needs, let alone, an additional 1,000 MW to deliver to an unknown customer in Mexico.
- 6 It seems to me that this whole attempt by TEP has deteriorated into an environmental and economic boondoggle of gigantic proportions, not only for Santa Cruz County, but for TEP itself. Therefore, I strongly urge you to use your influence to discourage any further waste of everyone's time and taxpayers money in such an ill conceived and irrational attempt by TEP, or any other party, to push through such an unneeded and potentially harmful proposal.

Comment No. 3

As part of DOE's decisionmaking process on whether to grant a Presidential Permit for the proposed project, DOE will determine whether the proposed project will adversely impact the reliability of the U.S. electric system. Also, before authorizing exports to Mexico over the proposed 345-kV facilities, DOE must ensure that the export will not impair sufficiency of supply within the United States and will not impede, or tend to impede, the coordinated use of the regional transmission system.

Comment No. 4

Refer to the response to Comment 1 above regarding the ACC.

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)

Comment No. 5

Analysis of the generation capacity of TEP is outside the scope of the EIS. Section 3.11.1 of the Final EIS has been revised to clarify that the proposed project does not include either the development of new or expansion of existing power generation facilities. The proposed project would utilize existing power on the Western electric grid. In addition, note that TEP anticipates using 400 MW of capability for transport of energy between the United States and Mexico rather than 1,000 MW as cited by the commentor (see Section 1.5, TEP's Proposed Project Capacity and Usage, of the Final EIS).

Comment No. 6

The Federal agencies note the commentor's preference for the No Action Alternative.

Devick, Dale A.

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Best regards,

Dale A. Devick
P O Box 4254,
Tubac, AZ 85646

For the next few weeks I can be contacted via e-mail or at:

915 Morningstar Ct.
Sartell, MN 56377
320-251-4023

Dewenter, David
Page 1 of 1

P.O. Box 90413
Henderson, NV 89009

RE: Tuscon Electric Power Sahuarita-Nogales Transmission line D.E.I.S.

Sue Kozacek
Forest Supervisor
Coronado National Forest
300W. Congress
Tuscon, Az 85701
October 13, 2003


Dear Sue Kozacek,

1 | I am writing to urge you to deny the special use permits for the Western and Crossover Routes because these plans are not compatible with the current use of the area.

2 | TEP's proposed Western Route and alternative Crossover Route would carve through some of the most remote and wild areas in Southeast Arizona, forever scarring the beautiful and irreplaceable landscape of the Tumacacori Highlands. This area contains several roadless areas as well as a citizen's proposed Wilderness area home to black bears, Mexican spotted owls, lesser-long nosed bats and peregrine falcons as well as lesser known species such as the Sonora chub, Mexican vine snake, elegant trogon and the Gentry indigo bush.

3 | I have enjoyed many trips into the Sky Island area of Arizona to view and hike the natural wonders of this area. The above routes would negatively affect this. The Tucson Electric Power plan in the preferred route would build over 20 miles of new road. Not only would this increase the road density over that stated in the current Forest Plan, but would decrease the wildlife habitat in the area. A Jaguar was seen in this location a few years back. Just maybe on one of my hikes I might see one, if the area remains wild.

2 cont.

Sincerely yours,

David Dewenter

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Comment No. 1

Sections 3.1 and 4.1 present a description of the existing land use and analyze the potential land use impacts from the proposed project.

Comment No. 2

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to hiking in the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System .

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife.

Comment No. 3

The Western Corridor would require construction of approximately 20 mi (32 km) of temporary new roads for construction on the Coronado National Forest, and the Central and Crossover Corridors would require fewer roads, and unnecessary project roads would be closed following construction (see Section 4.12, Transportation). The Tumacacori EMA of the Coronado National Forest in and of itself does not exceed road density limits set forth in the Forest Plan. Road density limits set forth in the Forest Plan are for the Coronado National Forest as a whole, not for individual land units or EMAs within the Coronado National Forest. TEP would close 1.0 mi (1.6 km) of existing road for every 1.0 mi (1.6 km) of proposed road to be used in the operation or long-term maintenance of the proposed project, such that road density on the Coronado National Forest would not be affected.

Dewenter, David
Page 1 of 1

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P.O. Box 90413
Henderson, Nevada 89009

October 13, 2003

RE:Tuscon Electric Power Sahuarita-Nogles Transmission line D.E.I.S.

Dr. Jerry Pell
Department of Energy
Office of Fossil Energy
Washington, D.C. 20585

Dear Dr. Pell,

1 I do not support the proposed routes because they do not serve Santa Cruz County's interests as intended under ACC order 62011 and am writing to urge you to withdraw the current draft Environmental Impact Statement (E.I.S.) for Tucson Electric Power's proposed 345 kilovolt powerline.

2 TEP's proposed "Western Route" and alternative "Crossover Route" would carve through some of the most remote and wild areas in Southeast Arizona, forever scarring the beautiful and irreplaceable landscape of the Tumacacori Highlands. This area contains several roadless areas as well as a citizen's proposed Wilderness area home to black bears, Mexican spotted owls, lesser-long nosed bats and peregrine falcons as well as lesser known species such as the Sonora chub, Mexican vine snake, elegant trogon and the Gentry indigo bush. A smaller, less obtrusive 115 kV line was not considered for any route. Why not? A 115kV line would be cheaper and could be run along existing corridors.

3 The important goal of providing fully reliable electrical service to the city of Nogales and Santa Cruz County must be achieved. Unfortunately, instead of building the small transmission line necessary to achieve this goal, TEP has proposed a massive, environmentally destructive, and controversial powerline designed to export power to Mexico.

4 The draft EIS is clearly inadequate, because it does not address important alternatives to TEP's powerline which would provide reliable service without destroying our environmental and cultural heritage, and which would not require huge increases to consumers' electricity bills. Again please withdraw the E.I.S. and issue a new assesment that includes a smaller powerline along current utility corridors.

Sincerely yours,



David Dewenter

.....

Comment No. 1

ACC Decision No. 62011 (ACC 1999) mandates the construction of a second transmission line to serve customers in Santa Cruz County, and does not reference the export of electricity to Mexico. However, TEP's stated purpose and need for the proposed project has a dual purpose to benefit both southern Arizona and Mexico.

Comment No. 2

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife.

Comment No. 3

A smaller transmission line (e.g., 115-kV line) in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis). The commentor's suggestion of building a line adjacent to the existing transmission line in the I-19 corridor was considered but eliminated from further analysis in the EIS (see Section 2.1.5 of the Draft EIS).

Comment No. 4

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...." When a Federal agency is evaluating a request for a permit for a proposed action developed by a non-Federal applicant (e.g., TEP), CEQ has opined that Federal agencies should select alternatives which are feasible given the applicant's stated goals and reflect the "common sense realities" of the situation. Therefore, the Federal agencies are evaluating the proposed project presented by TEP to each of the Federal agencies (see Section 1.2.2, Federal Agencies' Purpose and Need Statements).

The Draft EIS was prepared in accordance with Section 102(2)(c) of NEPA, the Council of Environmental Quality (CEQ) regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508), and all applicable laws, regulations, and agency policies. The Federal agencies have determined that the Draft EIS does not need to be re-issued for additional review.

Dewire, Mary
Page 1 of 1

From: Mary [SMTP:marydon@msinternet.net]
To: Pell, Jerry
Cc:

Subject: The beauty to be lost with TEP Sahuarita-Nogales
Transmission Lines

Sent: 10/13/2003 7:53 PM
Importance: Normal

Dear Dr. Pell,

Please do not allow the Western or Crossover Route to go
forward. I'm sure you've heard all the arguments. I'm not sure
you understand the beauty at stake.

Please go to www.arivaca.net.

There, you can read about the wonderful hikes and flora and
fauna in the area to be impacted.

This area is unique and irreplaceable. Are we going to trash it
for an unneeded overdone power project?

Mary Dewire

Comment No. 1

Each of the resource areas cited by the commentor are addressed in the EIS.
See Sections 3.1.2 and 4.1.2 for recreational resources, Sections 3.2 and 4.2
for visual resources, and Sections 3.3 and 4.3 for biological resources.

Diehn, Sonya A.
Page 1 of 2

----- Forwarded by Susan K Kozacek/R3/USDAFS on
10/09/2003 06:51 PM -----
sdiehn@biologicaldiversity.org
10/09/2003 05:00 PM

To: skozacek@fs.fed.us
cc:
Subject: Environmental Impact Statement for Tucson Electric
Power's proposed 345 kilovolt powerline

Ms. Sue Kozacek
Coronado National Forest
Federal Building, 300 West Congress
Tucson, AZ 85701

Dear Ms. Kozacek,

1 I am writing to urge you to withdraw the current draft
Environmental Impact Statement for Tucson Electric Power's
proposed 345 kilovolt powerline.

2 TEP's proposed "Western Route" and alternative "Crossover
Route" would carve through some of the most remote and wild
areas in Southeast Arizona, forever scarring the beautiful and
irreplaceable landscape of the Tumacacori Highlands. This
area contains several roadless areas as well as a citizen's
proposed Wilderness area home to black bears, Mexican
spotted owls, lesser-long nosed bats and peregrine falcons as
well as lesser known species such as the Sonora chub,
Mexican vine snake, elegant trogon and the Gentry indigo
bush. This area is also a vital wildlife corridor with Mexico --
a jaguar was sighted in here only two years ago.

Comment No. 1

The commentor's opinion that the Draft EIS should be withdrawn is noted.

Comment No. 2

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife.

Comment No. 3

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...." When a Federal agency is evaluating a request for a permit for a proposed action developed by a non-Federal applicant (e.g., TEP), CEQ has opined that Federal agencies should select alternatives which are feasible given the applicant's stated goals and reflect the "common sense realities" of the situation. Therefore, the Federal agencies are evaluating the proposed project presented by TEP to each of the Federal agencies (see Section 1.2.2, Federal Agencies' Purpose and Need Statements).

Diehn, Sonya A.
Page 2 of 2

3 The goal of providing reliable electrical service to the city of Nogales and Santa Cruz County may be achieved through building a small transmission line. However, TEP has proposed a massive, environmentally destructive and extremely controversial powerline designed to export power to Mexico. Creating "NAFTA for electricity" is a bad idea!

4 The draft EIS is clearly inadequate, because it does not address important alternatives to TEP's powerline which would provide reliable service without destroying our environmental and cultural heritage, and which would not require huge increases to consumers' electricity bills.

5 The recent blackout in the Northeast is an urgent reminder that our energy policy should be based on serving the public interest, not private corporate profits. I urge DOE to issue a new draft EIS which fully and rigorously explores available options -- including a local power plant and smaller power lines which would not serve Mexico -- to meet the important public interest of providing reliable energy service to Santa Cruz County.

Sincerely,

Sonya A. Diehn
PO Box 508
Tucson, Arizona 85702

Comment No. 3 (continued)

The passage of NAFTA in fact established the benefits of strengthening and enhancing the electricity trade with Canada and Mexico.

Comment No. 4

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Comment No. 5

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)

DiSpigno, Gona
Page 1 of 1

received
9/30/03

P.O. Box 701
Arivaca, AZ 85600
8-27-03

Jerry Pell, Ph.D., CCM
NEPA Document Mgr.
Office of Electric Power Regulation
Fossil Energy, FE-27
Dept. of Energy
Washington, D.C.
Dear Dr. Pell:

I need an Arivaca Street map showing the mileage from different points on the proposed High Tension Line to Roads on that side of town (Purple Mtn. Rd., Salasco Rd., Universal Ranch Road, East of Cedar Creek, Illi Teka Rd., ^{Hardscrabble} Road, Crooked Sky Rd., Cota Rd + Montana Ranch Road ^{and Cedar Creek Rd.} Far from Penny Road at the Ruby Rd. end - by direct line not by Rd.. In other words I need a map of mileage at different points on proposed high tension line to different points on all Rds. on that side of Arivaca.

cc: 2
Jerry Ginner I'm opposed to the High Tension Line. Your Cooperation will be appreciated. Sincerely, Gona DiSpigno

Comment No. 1

The town of Arivaca is located on Arivaca Road, an estimated 10 mi (16 km) west of the Western Corridor as it runs west of the Tumacacori Mountains, and is beyond the limits of the maps in the EIS.

TEP has not finalized the placement of the 125-ft (38-m) ROW within the 0.25-mi (0.40-km)-wide study corridors. If an action alternative is selected for implementation by each of the Federal agencies through the issuance of a ROD, then precise siting of the ROW and the support structures within the ROW would involve input from cultural, biological, and visual specialists, to identify and minimize impacts to each area of land to be disturbed. For this reason, the Final EIS cannot include maps showing a precise location for the ROW or the individual support structures.

Comment No. 2

The Federal agencies note the commentator's opposition to the proposed project.

DiSpigno, Gona
Page 1 of 1

Comment No. 1

Refer to the response to Comment 1 in the previous submittal from Gona DiSpigno.

Comment No. 2

The Federal agencies note the commentor's opposition to the proposed project.

Box 701
Arivaca AZ 85601
10-15-03
520-398-2692

Dr. Jerry Pell
NEPA Document Mgr.
Office of Electric Power Regulation
Fossil Energy, FE-27
Dept. of Energy
Washington, D.C.
Dear Dr. Pell:

How far would the Proposed High Tension Line be from these Arivaca Roads that run the farthest east off of Cedar Creek Rd. Jalisco Road Runs East from Cedar Creek Rd. When it Bends it changes names.

I need the distance from these Road names:

- Back Forty Rd.
- ILi Teka Rd
- Golden Nugget Rd.
- Camino Tres Cerros
- Universal Ranch Rd.
- Jalisco

Thank You. I am opposed to the Line.
Sincerely, Gona DiSpigno

Drees, Kevin
Pages 1 of 2

----- Forwarded by Susan K Kozacek/R3/USDAFS on
10/09/2003 06:51 PM -----
kpd@email.arizona.edu
10/09/2003 06:27 PM

To: skozacek@fs.fed.us
cc:
Subject: Environmental Impact Statement for Tucson Electric
Power's proposed 345 kilovolt powerline

Ms. Sue Kozacek
Coronado National Forest
Federal Building, 300 West Congress
Tucson, AZ 85701

Dear Ms. Kozacek,

1 | Please forbid TEP's proposed 345 kV power line to Mexico.
2 | The proposed line will cut through a beautiful and sensitive
3 | wilderness, and does not address the mandate to provide more
4 | reliable power to Santa Cruz county and Nogales. Instead,
5 | TEP is using this need as an excuse to blast power down to
6 | Santa Ana, Mexico. Wouldn't a local power plant be more
7 | efficient and less destructive?
8 | ***

9 | I am writing to urge you to withdraw the current draft
10 | Environmental Impact Statement for Tucson Electric Power's
11 | proposed 345 kilovolt powerline.

12 | TEP's proposed "Western Route" and alternative "Crossover
13 | Route" would carve through some of the most remote and wild
14 | areas in Southeast Arizona, forever scarring the beautiful and
15 | irreplaceable landscape of the Tumacacori Highlands. This
16 | area contains several roadless areas as well as a citizen's

Comment No. 1

ACC Decision No. 62011 (ACC 1999) mandates the construction of a second transmission line to serve customers in Santa Cruz County, and does not reference the export of electricity to Mexico. However, TEP's stated purpose and need for the proposed project is a dual purpose and need of benefiting both southern Arizona and Mexico.

Comment No. 2

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Comment No. 3

The commentor's opinion that the Draft EIS should be withdrawn is noted.

Comment No. 4

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife.

Drees, Kevin
Pages 2 of 2

4
 cont. | proposed Wilderness area home to black bears, Mexican spotted owls, lesser-long nosed bats and peregrine falcons as well as lesser known species such as the Sonora chub, Mexican vine snake, elegant trogon and the Gentry indigo bush. A jaguar was sighted in this area only two years ago.

5 | The important goal of providing fully reliable electrical service to the city of Nogales and Santa Cruz County must be achieved. Unfortunately, instead of building the small transmission line necessary to achieve this goal, TEP has proposed a massive, environmentally destructive, and extremely controversial powerline designed to export power to Mexico.

6 | The draft EIS is clearly inadequate, because it does not address important alternatives to TEP's powerline which would provide reliable service without destroying our environmental and cultural heritage, and which would not require huge increases to consumers' electricity bills.

7 | The recent blackout in the Northeast is an urgent reminder that our energy policy should be based on serving the public interest, not corporate private profits. I urge DOE to issue a new draft EIS which fully and rigorously explores all available options-including a local power plant and smaller power lines which would not serve Mexico-to meet the important public interest of providing reliable energy service to Santa Cruz County.

Sincerely,

Kevin Drees
 2727 E Lee St
 Tucson, Arizona 85716

Comment No. 5

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...." When a Federal agency is evaluating a request for a permit for a proposed action developed by a non-Federal applicant (e.g., TEP), CEQ has opined that Federal agencies should select alternatives which are feasible given the applicant's stated goals and reflect the "common sense realities" of the situation. Therefore, the Federal agencies are evaluating the proposed project presented by TEP to each of the Federal agencies (see Section 1.2.2, Federal Agencies' Purpose and Need Statements).

Comment No. 6

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Comment No. 7

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's

Comment No. 7 (continued)

proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)

Eames, Cliff
Page 1 of 2

Forwarded by Susan K Kozacek/R3/USDAFS on
10/16/2003 05:22 PM -----
cliff@akcenter.org
10/10/2003 02:47 PM

To: skozacek@fs.fed.us
cc:
Subject: Environmental Impact Statement for Tucson
Electric Power's
proposed 345 kilovolt powerline

Ms. Sue Kozacek
Coronado National Forest
Federal Building, 300 West Congress
Tucson, AZ 85701

Dear Ms. Kozacek,

1 | I have backpacked in Arizona a number of times. Its wild
areas are worthy of the utmost protection, especially at a
time when the federal administration is assaulting the
environment on innumerable fronts.

2 | I am writing to urge you to withdraw the current draft
Environmental Impact Statement for Tucson Electric
Power's proposed 345 kilovolt powerline.

3 | TEP's proposed "Western Route" and alternative "Crossover
Route" would carve through some of the most remote and
wild areas in Southeast Arizona, forever scarring the
beautiful and irreplaceable landscape of the Tumacacori
Highlands. This area contains several roadless areas as well
as a citizen's proposed Wilderness area home to black bears,
Mexican spotted owls, lesser-long nosed bats and peregrine
falcons as well as lesser

Comment No. 1

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Comment No. 2

The commentor's opinion that the Draft EIS should be withdrawn is noted.

Comment No. 3

Sections 3.2 and 4.2 describe existing visual resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife.

Eames, Cliff
Page 2 of 2

3 | known species such as the Sonora chub, Mexican vine snake,
cont. | elegant trogon and the Gentry indigo bush. A jaguar was
| sighted in this area only two years ago.

4 | The important goal of providing fully reliable electrical service
| to the city of Nogales and Santa Cruz County must be achieved.
| Unfortunately, instead of building the small transmission line
| necessary to achieve this goal, TEP has proposed a massive,
| environmentally destructive, and extremely controversial
| powerline designed to export power to Mexico.

5 | The draft EIS is clearly inadequate, because it does not address
| important alternatives to TEP's powerline which would provide
| reliable service without destroying our environmental and
| cultural heritage, and which would not require huge increases
| to consumers' electricity bills.

6 | The recent blackout in the Northeast is an urgent reminder that
| our energy policy should be based on serving the public
| interest, not corporate private profits. I urge DOE to issue a
| new draft EIS which fully and rigorously explores all available
| options-including a local power plant and smaller power lines
| which would not serve Mexico-to meet the important public
| interest of providing reliable energy service to Santa Cruz
| County.

Sincerely,

Cliff Eames
807 G St., #100
Anchorage, Alaska 99517

Comment No. 4

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...." When a Federal agency is evaluating a request for a permit for a proposed action developed by a non-Federal applicant (e.g., TEP), CEQ has opined that Federal agencies should select alternatives which are feasible given the applicant's stated goals and reflect the "common sense realities" of the situation. Therefore, the Federal agencies are evaluating the proposed project presented by TEP to each of the Federal agencies (see Section 1.2.2, Federal Agencies' Purpose and Need Statements).

Comment No. 5

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Comment No. 6

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)